

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC)
d/b/a WEATHER KING PORTABLE)
BUILDINGS,)
Plaintiff,)
v.) No. 1:22-cv-01230-STA-jay
JESSE A. MAUPIN, *et al.*,)
Defendants.)

PLAINTIFF'S MOTION FOR SANCTIONS

Pursuant to Fed. R. Civ. P. 37(a)(5), Plaintiff respectfully seeks an award against Defendants for Plaintiff's reasonable expenses, including attorney's fees, incurred in connection with pursuing its Motion to Compel Supplementation of Discovery Responses (Doc. 75). Plaintiff has filed herewith a memorandum of law in support of this motion and is submitting a proposed order granting this motion.¹

Respectfully submitted,

BUTLER SNOW LLP

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¹ Upon the Court's request, Plaintiff will be prepared to present proof of the expenses it has incurred.

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Attorneys for Plaintiff

CERTIFICATE OF COUNSEL

In accordance with Local Rule 7.2(a)(1)(B), I, counsel for Plaintiff certify that the parties' counsel have conferred about the relief requested in this motion but were unable to reach accord. Specifically, I have conferred with Attorney Thomas Pasternak via email correspondence dated June 20, 2023.

/s/ David L. Johnson
David L. Johnson

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, I filed the foregoing with the Court using the ECF system, which will provide notice and a copy to counsel of record:

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/s/ David L. Johnson
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